



## Draft General Permit for OCS Oil and Gas Facilities in Region 9

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Cc: DavidW Smith, Marcela VonVacano, Glenn Sakamoto, Js Wilson

05/24/2012 09:16 AM

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All,

Attached for your review (pre-public notice) is a draft general permit and fact sheet for OCS oil and gas facilities in Region 9. This would be a reissuance of the general permit issued in 2004.



ocs.generalpermit2012f.docx ocs.generalpermit.fact.sheet.2012o.docx

We have also attached Excel spreadsheets with an updated reasonable potential (RP) analysis for produced water discharges (and cooling water and fire control system discharges) using recent DMR data for:

- chemical constituents, and
- whole effluent toxicity (WET) using EPA's 2010 Test for Significant Toxicity procedure



BookRP6.chemicals.producedwater.xlsm BookRP3.chlorine.xlsm



BookRP.OCS.topsmelt3.xlsm BookRP.OCS.tox.kelp3.xlsm BookRP.OCS.abalone1.xlsm

The Excel spreadsheets include a Visual Basic program which performs the RP calculations for chemical constituents according to the procedures in:



RP.procedure.pdf COP.EPA.WQC.comparison.pdf

which are the same procedures used for the 2004 permit.

For WET, the program follows the RP procedures in:



wet\_final\_tst\_implementation2010.pdf

using DMR data at a concentration below (i.e., more diluted, Treat1) than the instream waste concentration (IWC) (which for the platforms is the concentration at the edge of the mixing zone), and above the IWC (Treat2) - the 2004 permit did not require WET tests exactly at the IWC and these are the

closest results available.

We are requesting any comments you may have on these drafts within one month of the date of this email, including feedback on the following three issues:

- Does industry continue to not have an interest in using synthetic based muds (SBFs) in Region 9?
- Please review the maximum discharge volumes for drilling muds, cuttings, excess cement slurry and produced water (Tables 3 and 4 in the draft permit) and advise whether these amounts are still needed (and what alternate amounts might be appropriate, if any).
- Which platforms already have on-line monitoring devices for oil and grease in the produced water discharges?

Please also note that EPA's HQ and Region 9's Regional Counsel are still reviewing these drafts, and the drafts may need a few revisions based on that continuing review. We will keep you informed of any changes in that regard.

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